

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHEVRON CORPORATION,

Plaintiff,

: Docket No. 11 CV 0691 (LAK)

v.

STEVEN DONZIGER, et al.,

Defendant.

**PLAINTIFF CHEVRON CORPORATION'S NOTICE OF MOTION TO SANCTION  
AND HOLD THE DONZIGER DEFENDANTS AND LAP REPRESENTATIVES IN  
CONTEMPT OF COURT FOR DISOBEYING THE COURT'S DISCOVERY ORDERS**

PLEASE TAKE NOTICE that upon the Declaration of Anne Champion, dated March 12, 2013, together with the exhibits thereto, and the accompanying Memorandum of Law submitted herewith, Plaintiff Chevron Corporation will move this Court before the Honorable Lewis A. Kaplan, United States District Judge, for an order, pursuant to Rule 37 of the Federal Rules of Civil Procedure and the Court's inherent power, that holds Steven Donziger, the Law Firm of Steven R. Donziger, and Donziger & Associates, PLLC (collectively, the "Donziger Defendants") and Hugo Gerardo Camacho Naranjo and Javier Piaguaje Payaguaje (collectively, the "LAP Representatives") in contempt of court for disobeying the Court's discovery orders and imposes sanctions including but not limited to the entry of a default judgment, striking the Donziger Defendants' answer and counterclaims, striking the LAP Representatives' answer, prohibiting the LAP Representatives and the Donziger Defendants from opposing Chevron's claims, the entry of adverse findings of facts, and the direction of adverse inferences of fact.

Dated: March 12, 2013  
New York, New York

Respectfully submitted,

/s/ Randy M. Mastro  
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